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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CLEVELAND, OHIO
JR

) SUPERSEDING

) INDICTMENT

) JUDGE SOLOMON OLIVER, JR.

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) CASE NO: 1:19CR00035

) Title 18, United States Code,
) Sections 871(a), 879(a)(2),
) 1001(a)(2), and 2339B(a)(1)

(Attempting to Provide Material Support or Resources to a Foreign Terrorist Organization,
18 U.S.C. § 2339B(a)(1))

1. From in or around February 13, 2018 through on or about July 1, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DEMETRIUS N. PITTS, aka “Abdur Raheem Rahfeeq,” aka “Salahadeen Osama Waleed,” a citizen of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including himself) and services, to a foreign terrorist organization, namely al Qa’ida, also known as al Qaeda, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated terrorist organization and that the organization has engaged in and engages in terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

(Threats against the President of the United States, 18 U.S.C. § 871(a))

The Grand Jury further charges:

2. On or about June 15, 2018, in the Northern District of Ohio, Eastern Division, Defendant DEMETRIUS N. PITTS, aka “Abdur Raheem Rahfeeq,” aka “Salahadeen Osama Waleed,” did knowingly and willfully make a threat to take the life of, to kidnap, and to inflict bodily harm upon President Donald J. Trump, specifically that Defendant would “get” the President by cutting off the President’s head and hands, in violation of Title 18, United States Code, Section 871(a).

COUNT 3

(Threats against Immediate Family Members of the President of the United States, 18 U.S.C. § 879(a)(2))

The Grand Jury further charges:

3. On or about June 15, 2018, in the Northern District of Ohio, Eastern Division, Defendant DEMETRIUS N. PITTS, aka “Abdur Raheem Rahfeeq,” aka “Salahadeen Osama Waleed,” did knowingly and willfully threaten to kill, kidnap, or inflict bodily harm upon a member of the immediate family of the President, to wit, the children of President Donald J. Trump, specifically that “. . . a better way to get, to get him (the President) is to kill his kids. Kill his daughter, son-in-law. Kill ‘em all. He (the President) come out ‘cause you start killing his kids, chop their heads off. . . you send his kids back,” in violation of Title 18, United States Code, Section 879(a)(2).

COUNT 4

(False Statements to Law Enforcement, 18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

4. On or about July 1, 2018, in the Northern District of Ohio, Eastern Division, Defendant DEMETRIUS N. PITTS, aka “Abdur Raheem Rahfeeq,” aka “Salahadeen Osama Waleed,” knowingly and willfully made material false, fictitious and fraudulent statements to a special agent of the Federal Bureau of Investigation (FBI) in a matter involving domestic and international terrorism and within the jurisdiction of the executive branch of the government of the United States, that is, Defendant stated that he was not aware of any specific plans for an impending terrorist attack in the City of Cleveland or elsewhere, when in truth and fact, as Defendant then well knew, those statements to the FBI special agent were false, in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 5

(False Statements to Law Enforcement, 18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

5. On or about July 1, 2018, in the Northern District of Ohio, Eastern Division, Defendant DEMETRIUS N. PITTS, aka “Abdur Raheem Rahfeeq,” aka “Salahadeen Osama Waleed,” knowingly and willfully made material false, fictitious and fraudulent statements to a special agent of the Federal Bureau of Investigation (FBI) in a matter involving domestic and international terrorism and within the jurisdiction of the executive branch of the government of the United States, that is, Defendant stated that he never discussed terrorist activity with an individual that he believed to be an al Qaeda operative, when in truth and fact, as Defendant then

well knew, those statements to the FBI special agent were false, in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002.